



MEREDITH &  
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May 1, 2008

Honorable Barbara S. Jones  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl St., Room 620  
New York, NY 10007

**Re: *Mei L. Wang et al. v. CYR International, Inc. et al.* No. 07-cv-05462 (BSJ)**

Dear Judge Jones:

We represent the Plaintiffs in the above referenced matter. We write this letter to respectfully bring to the Court's attention that Defendants Chew Young Roo (Fort Lee, NJ) and Chew Young Roo (Upper Darby, PA), who were the subject of Plaintiffs' application for an Order to Show Cause for an entry of a Default Judgment and Expedited Relief filed by the Plaintiffs on October 25, 2007 have filed no responsive pleading or motion nor have otherwise made an appearance in this case - only Defendant Chew Young Roo (Closter, NJ) filed an untimely Answer and have since entered into a settlement agreement with Plaintiffs at Magistrate Judge Maas' settlement conference held on April 18, 2008.

As provided with Plaintiffs' application for default judgment, the three Defendants were properly served with the Summon and Complaint in this action: on July 10, 2007 Defendant Chew Young Roo, Uppder Darby PA, on August 14, 2007 Defendant Chew Young Roo Closter, NJ, and on October 4, 2007 Defendant Chew Young Roo Fort Lee, NJ were served. See affidavits of service filed on ECF (Doc. Nos. 9, 13 and 14).

Accordingly, Plaintiffs respectfully request, as provided in Plaintiffs' application for a default Judgment, that the Court enter an order for a default judgment against Defendants Chew Young Roo (Fort Lee, NJ) and Chew Young Roo (Upper Darby, PA) who have filed no responsive pleading or motion nor have otherwise made an appearance in this case.<sup>1</sup>

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<sup>1</sup> This Court entered an Order on December 14, 2007 denying Plaintiffs' application for entry of default judgment against the Defendants on the grounds that the "Defendants had since opposed this [Plaintiffs'] motion averring that they had never been properly served with the summons and complaint" - the opposition was *only* made by Defendant Chew Young Roo (Closter, NJ) and the other two Defendants Chew Young Roo (Fort Lee) and Chew Young Roo (Upper Darby, PA), as indicated above, have filed no responsive pleading or motion nor have otherwise made an appearance in this case and were properly served with the Summons and Complaint.

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Respectfully submitted,

A handwritten signature in black ink that reads "Dariush Keyhani". The signature is written in a cursive, flowing style.

Dariush Keyhani<sup>2</sup>

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<sup>2</sup> Admitted to the Southern, Eastern and Western Districts of New York, New Jersey District Court & NJ State Bar-not a member of the NY State Bar